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February 14, 2005

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: WT Docket 94-102

Dear Ms. Dortch:

The Mid-America Regional Council (MARC) administers the regional 9-1-1 system in the Kansas City metropolitan area. MARC is comprised of forty-eight Public Safety Answering Points (PSAP) in nine counties covering thirty-eight hundred square miles. The PSAPs in the MARC area handle approximately two million 9-1-1 calls each year and approximately 40% of these calls are from wireless devices.

MARC is very concerned about the issue of wireless 9-1-1 accuracy. The elected officials and citizens of our region have invested approximately \$12 million in equipment alone to implement wireless enhanced 9-1-1 services. There was extensive public debate before investing these funds and a large part of the consideration was the FCC accuracy requirements that were established as a result of CC Docket 94-102. Clearly, we believed that the accuracy requirements contained in the order applied to every area of our jurisdiction.

We support the Association of Public-Safety Communications Officials Inc. (APCO) in seeking clarification "regarding the geographic area over which a wireless carrier must provide the levels of 9-1-1 location accuracy." The most logical determination, for accuracy and processing of a wireless 9-1-1 call, should take place at the PSAP service level.

MARC encourages the Federal Communications Commission to closely examine this issue and clarify that the intent of the original order was that the accuracy requirement would apply to every area that deployed Phase II according to the Commissions rules. Further, that every wireless carrier would be required to comply and certify compliance by testing their system operation within each PSAP area.

In the interest of public safety and fairness to the citizens we represent, we urge the Commission to clarify the original order as described above.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory S. Ballentine".

Gregory S. Ballentine  
Director of Public Safety

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